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Attorneys for Defendant
 ILLINOIS NATIONAL INSURANCE COMPANY

UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK

-----	X	
In re	:	
	:	Chapter 11
REFCO. INC. et al.,	:	
	:	Case No. 05-60006 (RDD)
Debtors.	:	
-----	X	Jointly Administered
TONE N. GRANT,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Adv. Proc. No. 08-1129-RDD
	:	
ILLINOIS NATIONAL INSURANCE COMPANY	:	
AND NATIONAL UNION FIRE INSURANCE	:	
COMPANY OF PITTSBURGH, PA.,	:	
	:	
Defendants.	:	
-----	X	

**NOTICE OF MOTION TO WITHDRAW THE
 REFERENCE TO THE BANKRUPTCY COURT**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, the Declaration of Kevin J. Windels and the exhibits annexed thereto, and all of the papers and proceedings heretofore had herein, defendant Illinois National Insurance Company ("Illinois

National”), by its attorneys, D’Amato & Lynch, LLP, will move in the United States District Court for the Southern District of New York, at Daniel P. Moynihan United States Courthouse, 500 Pearl Street, New York, New York, before a judge to be assigned, on June 10, 2008, at 9:30 a.m., or as soon thereafter as counsel may be heard, for the entry of an Order, pursuant to 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011(a), and Local Bankruptcy Rule 5011-01, for cause shown, withdrawing the reference to the United States Bankruptcy Court for the Southern District of New York in the above-captioned Adversary Proceeding filed by Tone N. Grant against Illinois National, for the reasons more fully set forth in the Memorandum of Law, together with such other relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Local Civil Rule 6.1(b), answering papers, if any, shall be served upon the undersigned no later than ten business days after service of this Notice of Motion.

Dated: New York, New York
May 16, 2008

Yours, etc.,

D’AMATO & LYNCH, LLP

By: s/
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AFFIDAVIT OF SERVICE VIA E-MAIL AND OVERNIGHT MAIL

STATE OF NEW YORK)

ss.:

COUNTY OF NEW YORK)

STEPHEN F. WILLIG, being duly sworn, deposes and says: deponent is not a party to the action, is over 18 years of age and resides in Hazlet, New Jersey.

On May 16, 2008, deponent served the within **NOTICE OF MOTION TO WITHDRAW THE REFERENCE TO THE BANKRUPTCY COURT** upon:

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the attorneys for the plaintiff and the plan administrator herein at the e-mail address designated and agreed to in writing by said person for that purpose by electronically delivering a true copy thereof, and also at the address(es) designated by said attorney(s) for that purpose by leaving a true copy of same enclosed in a pre-paid properly addressed wrapper for UPS overnight delivery.

s/Stephen F. Willig
STEPHEN F. WILLIG

Sworn to before me this
16th day of May, 2008

s/Kevin J. Windels
NOTARY PUBLIC